

1 MONTGOMERY Y. PAK, ESQ., Bar # 10176
2 ETHAN D. THOMAS., ESQ., Bar # 12874
3 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: mpaek@littler.com
6 Email: edthomas@littler.com

7 *Attorneys for Defendant*
CITY OF HENDERSON

8 UNITED STATES DISTRICT COURT
9
10 DISTRICT OF NEVADA

11 KELLY WOODBURN and THOMAS
12 WOODBURN, individually and on behalf
of all others similarly situated,

13 Plaintiffs,

14 vs.

15 CITY OF HENDERSON; DOES I through
16 V, inclusive; and ROE CORPORATIONS
I through V, inclusive,

17 Defendants.

Case No. 2:19-cv-01488-JAD-VCF

**STIPULATION AND ORDER FOR AN
EXTENSION OF TIME FOR DEFENDANT
TO FILE OPPOSITION TO PLAINTIFFS'
MOTION FOR LEAVE TO FILE SECOND
AMENDED COMPLAINT AND OPPOSITION
TO PLAINTIFFS' MOTION FOR
COLLECTIVE ACTION**

(First Request)

ECF No. 43

18
19 Plaintiffs KELLY WOODBURN and THOMAS WOODBURN ("Plaintiffs"), and Defendant
20 CITY OF HENDERSON ("Defendant"), by and through their respective counsel of record, do hereby
21 stipulate and request an order extending the time for Defendant to file an Opposition to Plaintiffs'
22 Motion for Leave to File Second Amended Complaint (ECF No. 40), filed April, 23, 2021, by two
23 weeks from the current deadline of May 7, 2021 up to and including **May 21, 2021**. The parties also
24 agree to a reciprocal extension of the deadline for Plaintiffs' Reply in support of that Motion by one
25 week and it shall be filed no later than, **June 4, 2021**.

26 The parties also hereby stipulate and request an order extending the time for Defendant to file
27 an Opposition to Plaintiffs' Motion for Collective Action Pursuant to 29 U.S.C. § 216(b) (ECF No.
28 41), filed April 29, 2021, by three weeks from the current deadline of May 13, 2021 up to and including

1 **June 3, 2021.** The parties also hereby agree that Plaintiffs' Reply in support of that Motion shall be
2 extended by two weeks and shall be filed no later than **June 24, 2021.**

3 The extensions requested are sought prior to the expiration of the deadlines in question and are
4 needed to allow Defendant additional time to consider and prepare responses to the two motions
5 recently filed by Plaintiffs and to accommodate Defense Counsel's professional caseload and personal
6 commitments over the coming weeks. Defendant also needs additional time to investigate some of the
7 issues raised in Plaintiffs' motions. This is the first request for an extension of the deadlines set forth
8 herein. The parties agree and represent to the Court that this request is made in good faith and not for
9 the purpose of delay.

10 Dated: May 4, 2021

Dated: May 4, 2021

11 CLAGGETT & SYKES LAW FIRM

LITTLER MENDELSON, P.C.

13 By: /s/ Joseph N. Mott
14 JOSEPH N. MOTT, ESQ.

By: /s/ Ethan D. Thomas
MONTGOMERY Y. PAEK, ESQ.
ETHAN D. THOMAS, ESQ

15 Attorneys for Plaintiffs
16 KELLY WOODBURN and THOMAS
WOODBURN

Attorneys for Defendant
CITY OF HENDERSON

18
19 **ORDER**

20 IT IS SO ORDERED.

21
22 
23 U.S. District Judge

24 DATED: 5-11-2021

25 4841-2949-1175.1